

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETT

BETTE J. RIVARD, as Administratrix of
the Estate of John A Horton,
Plaintiff,

v.

DARTMOUTH HOUSE OF
CORRECTION, BRISTOL COUNTY,
JOHN DOE, RICHARD ROE, Bristol
County Corrections employees the identity
and number of whom is presently unknown
to the Plaintiff,

Defendants/Third Party Plaintiffs,

v.

PRISON HEALTH SERVICES, INC. and
CORRECTIONAL HEALTH CARE
SOLUTIONS, INC.

Third Party Defendants

Civil Action No.: O4CV12058WGY

**PLAINTIFF, BETTE J. RIVARD'S MOTION
FOR ADDITIONAL TIME TO FILE
OPPOSITION TO DEFENDANT'S MOTION
FOR SUMMARY JUDGMENT**

NOW COMES the Plaintiff, Bette J. Rivard, in the above captioned matter, by and through her attorneys, **Proulx Law Associates, P.C.**, and moves this Honorable Court to allow the Plaintiff more time to submit an opposition to the Defendant's Joint Motion for Summary Judgment and as reasons therefore the Plaintiff states:

1. That Plaintiff needs more time to adequately prepare an effective opposition to Defendant's Joint Motion for Summary Judgment. Fourteen days has not been an adequate amount of time to prepare an opposition to an 160 page motion, (including memorandum and exhibits).
2. That the Plaintiff has co-counsel in this matter Andrew Fischer who has been on vacation and Plaintiff has not had adequate time to confer with co-counsel to finish preparing an opposition.

WHEREFORE, the Plaintiff moves this Honorable Court to allow the Plaintiff an additional 15 days to prepare Plaintiff's opposition to Defendant's Joint Motion for Summary Judgment.

Dated this the 19th day of December, 2005.

PLAINTIFF,
By her Attorney,



Robert M. Proulx, Esquire

Proulx Law Associates, P.C.

Attorneys at Law

170 High Street, Suite 301

Taunton, Massachusetts 02780-3536

Phone: 508.823.6441

Facsimile: 508.967.2737

BBO# 640653

CERTIFICATE OF SERVICE

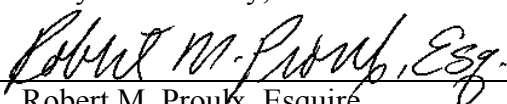
I hereby certify that a true copy of the above document was served via first class mail postage pre-paid, on December 19th, 2005 to:

√ Regina M. Ryan, Esquire
Merrick Louison & Costello
67 Batterymarch Street
Boston, MA 02110

√ Mary C. Eiro-Bartevyan, Esquire
Koufman & Frederick, LLC
265 Essex Street, Ste. 301
Salem, MA 01970

PLAINTIFF,

By her Attorney,



Robert M. Proulx, Esquire

Proulx Law Associates, P.C.

Attorneys at Law

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**CERTIFICATE OF COMPLIANCE WITH
LOCAL RULE 7.1(A)(2)**

NOW COMES the Plaintiff, Bette J. Rivard, in the above captioned matter, pursuant to Rule 7.1(A)(2) of the Local Rules of the United States District Court for the District of Massachusetts, and state that Attorney Robert M. Proulx attempted to confer with the Defendant's counsel, Regina M. Ryan and Mary Eiro Barteveyan to narrow the issues and he was unable to do so.

Dated this the 19th day of December, 2005.

PLAINTIFF,

By her Attorney,



Robert M. Proulx, Esquire

Proulx Law Associates, P.C.

Attorneys at Law

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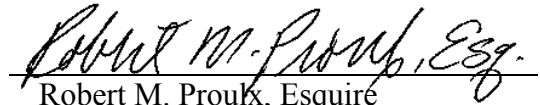
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